

EXHIBIT K

ORIGINAL

Page 1

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUSAN McCARTHY

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Plaintiff,

- against -

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ROOSEVELT UNION FREE SCHOOL DISTRICT;
DEBORAH L. WORTHAM, individually and
in her Official Capacity; CLYDE
BRASWELL, individually and in his
Official Capacity; EDITH HIGGINS,
individually and in her Official
Capacity; Roosevelt Union Free School
District employees "JOHN DOE" 1-10 (the
name "John Doe" be fictitious, as the
true names are presently unknown);
COUNTY OF NASSAU; NASSAU COUNTY POLICE
DEPARTMENT; POLICE OFFICER JOSEPH STASSI,
individually and in his Official
Capacity; POLICE OFFICER MONIQUE AMODEO,
individually and in her Official
Capacity; MEDIC MATTHEW FIELD,
individually and in his Official
Capacity; Nassau County employees
"JOHN DOE" 11-20 (the name "John Doe"
being fictitious, as the true names are
presently unknown).

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Defendants.

240 Denton Place
Roosevelt, New York
May 12, 2016
3:56 P.M.

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WITNESS: MATTHEW FIELD

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5 DEPOSITION of MATTHEW FIELD, one of the
6 Defendants herein, taken by the Plaintiff and
7 Co-Defendants herein, pursuant to The Federal Rules
8 Of Civil Procedure, held at the above-mentioned time
9 and place, before Raymond Stalker, RPR, a Notary
10 Public of the State of New York.

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2 A P P E A R A N C E S :
3 WOLIN & WOLIN, P.C.
4 Attorneys for Plaintiff
420 Jericho Turnpike
Jericho, New York 11753

5

6 BY: ALAN E. WOLIN, ESQ.

7

8 SILVERMAN & ASSOCIATES
9 Attorneys for Defendants
Roosevelt Union Free School District,
Deborah L. Wortham, Clyde Braswell,
Edith Higgins, district employees
John Doe 1-10
10 445 Hamilton Avenue
White Plains, New York 10601

11

12 BY: GERALD S. SMTIH, ESQ.

13

14 NASSAU COUNTY ATTORNEY'S OFFICE
15 Attorneys for Defendants
County of Nassau; Nassau County Police
Department; POLICE Officer Joseph Stassi,
Police Officer Monique Amodeo,
Medic Matthew Field, Nassau County employees
16 "JOHN DOE" 11-20
One West Street,
Mineola, New York 11501

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18 BY: LIORA BEN-SOREK, ESQ.

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5 IT IS HEREBY stipulated and agreed by and
6 among counsel for the respective parties hereto,
7 that the sealing and certification of the within
8 deposition shall be and the same hereby waived.

9 IT IS FURTHER STIPULATED AND AGREED that all
10 objections, except to the form of the question,
11 shall be reserved to the time of trial;

12 IT IS FURTHER STIPULATED AND AGREED that the
13 within deposition may be signed before any Notary
14 Public with the same force and effect as if signed
15 and sworn to before the court.

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1 MATTHEW FIELD
2 M A T T H E W F I E L D , one of the Defendants
3 herein, having first been duly sworn by a Notary
4 Public of the State of New York, was examined and
5 testified as follows:

6 MS. BEN-SOREK: Pertaining to
7 Medic Matthew Field and the prior
8 deposition, which was of Police
9 Officer Amodeo, the defense would
10 request under the civil rules copies
11 of the transcripts to enabled the
12 officers and AMT to review their
13 testimony and see if there is A need
14 for any amendments or corrections.

15 MR. WOLIN: Right.

16 Good afternoon. My name Alan
17 Wolin. I am attorney and I represent
18 Ms. McCarthy in this lawsuit that she
19 has brought. I will be asking you a
20 few questions concerning the facts
21 and circumstances of the lawsuit.

22 If at any time I ask you a
23 question that you don't understand,
24 ask me to rephrase it, then I will
25 attempt to do the best I can.

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1 MATTHEW FIELD

2 EXAMINATION BY

3 MR. WOLIN:

4 Q. Please state your full name for
5 the record.

6 A. Matthew Field.

7 Q. What is your present business
8 address?

9 A. Police Headquarters, 1490
10 Franklin Avenue, Mineola, New York 11501.

11 Q. Did you speak to anyone to
12 prepare for this deposition today?

13 A. Prior to?

14 Q. Yes.

15 A. I met with Ms. Sorek.

16 Q. And when did you meet with her?

17 A. Oh, probably over a month ago.

18 Q. Did you speak to anybody else,
19 besides counsel, to prepare for this
20 deposition?

21 A. No, sir.

22 Q. Did you review any documents to
23 prepare for this deposition?

24 A. The PCR, sir.

25 Q. And that's the patient care

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1 MATTHEW FIELD

2 report?

3 A. Yes, sir.

4 Q. I show you what had been marked
5 as Exhibit 11; is that patient care report
6 that you reviewed?

7 A. It looks to be the same.

8 Q. Did you review any other
9 documents to prepare to deposition?

10 A. I looked at my copy of the memo
11 book.

12 MR. WOLIN: Please mark this.

13 (Whereupon, at this time, the
14 above-mentioned memo book was marked
15 by the reporter as Plaintiff's
16 Exhibit 16, for identification, as of
17 this date.)

18 Q. I show what we have just marked
19 as Exhibit 16; is that excerpt from the memo
20 book that you were referring to?

21 A. Its looks to be, sir.

22 Q. Did you review any other
23 documents to prepare this deposition?

24 A. No.

25 Q. And by whom are you currently

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1 MATTHEW FIELD

2 employed?

3 A. Nassau County Police Department.

4 Q. And how long have you been
5 employed by the Nassau County Police
6 Department?

7 A. Since 2009.

8 Q. And what is your job title?

9 A. Nassau County Police Department
10 police Medic.

11 Q. Have you served in that job title
12 during your entire career with Nassau County?

13 A. No.

14 Q. How long have been a medic?

15 A. Since February of 2011.

16 Q. And prior to that what was your
17 job title?

18 A. Communications operator.

19 Q. That was with the police
20 department also; is that correct?

21 A. Yes, sir.

22 Q. And what training have you
23 received to be a medic?

24 A. I went through the Fire Police
25 Academy to become an emergency medical

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1 MATTHEW FIELD
2 technician critical care. Then I went
3 through the police department portion of it
4 once I got hired in 2011, which included
5 training in the police academy and then also
6 in the Fire Police Academy.

7 Q. Now, we have also used the
8 acronym AMT?

9 A. Yes, sir.

10 Q. Are you also considered an AMT?

11 A. We were until recent.

12 Q. So the title has changed?

13 A. Yes.

14 Q. But the job duties are the same?

15 A. Yes, sir.

16 Q. Going back to May 2014, your job
17 was then an AMT?

18 A. Yes, sir.

19 Q. Just a couple of other background
20 questions. Have you ever testified under
21 oath before?

22 A. No, sir.

23 Q. Have you ever been convicted of a
24 crime?

25 A. No, sir.

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1 MATTHEW FIELD

2 Q. Now, I want to direct your
3 attention to May 28th, 2014; were you working
4 on that day?

5 A. Yes, sir.

6 Q. What tour were you working?

7 A. Day tour. I work 0700 to 1900.

8 Q. Did there come a time that you
9 were dispatched to Sportsman Avenue in
10 Freeport?

11 A. Yes, sir.

12 Q. How were you dispatched to that
13 location?

14 A. Fire and Communications Bureau.

15 Q. What did the Communication Bureau
16 say at the time?

17 A. I don't recall.

18 Q. Is it a dispatcher who dispatches
19 you to the scene?

20 A. Yes, sir.

21 Q. And do they tell you the type of
22 situation that it is?

23 A. To the best of their knowledge.

24 Q. Do you remember what they said in
25 this situation?

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1 MATTHEW FIELD

2 A. No.

3 Q. Do you remember anything about
4 what they said?

5 A. No, sir.

6 Q. A time came that you reported to
7 this location in Sportsman's Avenue in
8 Freeport?

9 A. Just rephrase.

10 Q. Did a time come on May 28th, 2014
11 that you responded to Sportsman Avenue in
12 Freeport?

13 A. The time come meaning?

14 Q. Did you?

15 A. Yes, sir.

16 Q. That's just a fancy way that
17 lawyers sometimes phrase it.

18 Did you report to Sportsman
19 Avenue in Freeport on May 28th?

20 A. Yes, sir.

21 Q. Were you driving an ambulance in
22 going there?

23 A. Yes, sir. We always drive
24 ambulances.

25 Q. When you arrived at the scene,

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1 MATTHEW FIELD

2 did you encounter any police officers?

3 A. Police officers are always
4 dispatched to the calls were assigned to,
5 yes.

6 Q. Were there police officers
7 already on the scene when you arrived?

8 A. I believe so, yes.

9 Q. Do you remember who the police
10 officers were?

11 A. Officer Stassi and Amodeo.

12 Q. Had you every met them before
13 that day?

14 A. Yes, sir.

15 Q. Approximately how many times?

16 A. I wouldn't be able to give a
17 number, sir.

18 Q. When you arrived on the scene,
19 did you speak to either or both of the police
20 officers?

21 A. I don't recall specifically, but
22 typically yes, I do.

23 Q. Do you remember specifically what
24 happened on May 28th when you arrived?

25 A. Just from what I remember of what

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1 MATTHEW FIELD

2 I wrote in my PCR.

3 Q. You can us it TO refresh your
4 recollection by looking at IT, but I would
5 like you to testify as best you can
6 independently of looking at the documents,
7 but you can look at the document to refresh
8 your recollection.

9 Can you tell me in your own words
10 what happened when you arrived at the 233
11 Sportsman Avenue location?

12 A. The police stated they had a
13 female that told the school psychologist that
14 she wanted to hurt herself.

15 Q. Do you remember which of the
16 police officers said that to you?

17 A. No.

18 Q. Did either of the police officers
19 say anything else to you?

20 A. I don't recall.

21 Q. Did either of police officer tell
22 you that Ms. McCarthy had told the police
23 officers that she wanted to kill herself?

24 A. Say that again.

25 Q. Did either of the police officers

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1 MATTHEW FIELD

2 tell you that Ms. McCarthy had told them, the
3 police officers, in their presence that she
4 wanted to kill herself.

5 A. I don't recall.

6 Q. What, if anything, else did the
7 police officers say to you when you arrived?

8 A. I don't recall.

9 Q. Now, did you see Ms. McCarthy?

10 A. Yes, sir.

11 Q. First of all, where was she when
12 you saw her?

13 A. I don't recall.

14 Q. Can you describe her demeanor
15 when you saw her?

16 A. I don't recall.

17 Q. Do you remember if she was calm,
18 do you remember if she was upset?

19 A. Specifically, no.

20 Q. Do you remember generally?

21 A. If somebody was not calm they
22 would typically either be restrained or and I
23 would have documented that. I don't see that
24 on my documentation.

25 Q. So if she was restrained it would

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1 MATTHEW FIELD

2 have been on your documentation?

3 A. Yes, sir.

4 Q. What does it mean to be
5 restrained?

6 A. Handcuffed.

7 Q. Under what circumstances does a
8 police officer handcuff someone who may be
9 mentally disabled?

10 A. I'm not sure of their procedure.

11 Q. But you didn't observe her to be
12 restrained; is that correct?

13 A. I don't believe so, because
14 otherwise it would have been documented.

15 Q. Now, when you saw her, was she
16 standing, was she sitting on a chair?

17 A. I don't recall.

18 Q. When you saw here, do you recall
19 her acting out in any way, shape or form?

20 A. I don't recall.

21 Q. If she was acting out would, that
22 be in your report?

23 MS. BEN-SOREK: Objection to
24 form. You can answer.

25 A. I'm sorry.

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1 MATTHEW FIELD

2 Q. Do you understand what I mean by
3 acting out?

4 A. Can you explain?

5 Q. Was she displaying any emotions,
6 was she threatening anybody --

7 A. I don't recall.

8 Q. -- was she flailing her arms or
9 legs?

10 A. I don't recall.

11 Q. Was she yelling, was she doing
12 anything to display any signs of being
13 mentally disturbed?

14 A. I don't recall, sir.

15 Q. Have you dealt with mentally
16 disturbed people in the past?

17 A. Yes, sir.

18 Q. Do they usually, in your
19 encounters with them, do they usually display
20 any type of demeanor?

21 A. All cases are different.

22 Q. Well, if somebody is truly mental
23 disturbed, what demeanor do they portray?

24 MS. BEN-SOREK: Objection. You
25 can answer.

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1 MATTHEW FIELD

2 A. It's hard to say because,
3 somebody could have made statement, somebody
4 could be acting irrational, so those are two
5 separate types, but they're classified under
6 mental.

7 Q. But you don't recall there being
8 anything indicating she was anything other
9 than calm when you arrived?

10 A. I don't recall.

11 MS. BEN-SOREK: Objection.

12 Q. Did you speak to Ms. McCarthy
13 when you arrived?

14 A. Based on my PCR, yes.

15 Q. What did you say to her and what
16 did she say to you?

17 A. I don't recall specifics.

18 Q. When did you prepare the PCR?

19 A. En route to the hospital.

20 Q. So you dictated it?

21 A. We type.

22 Q. You typed it in the ambulance on
23 the way to the hospital after the officer was
24 driving?

25 A. Either there or at the hospital.

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1 MATTHEW FIELD

2 I don't recall in this specific situation.

3 Q. Do you remember who drove the
4 ambulance?

5 A. Again, going back to my PCR, it
6 says, "PO Stassi."

7 Q. Then the other police officer
8 would of driven the patrol car?

9 A. Typically.

10 Q. Now, were you sitting with Ms.
11 McCarthy in what do you call it, I guess the
12 ambulance portion of the vehicle?

13 A. Yes, sir.

14 Q. Did you have any conversation
15 with her?

16 A. I don't recall specific, other
17 than what I documented here.

18 Q. While you were en route to the
19 hospital, was she calm?

20 A. I don't recall.

21 Q. If there was anything unusual or
22 anything untoward, would it be reflected in
23 your report?

24 MS. BEN-SOREK: Objection.

25 A. Yes, sir.

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1 MATTHEW FIELD

2 Q. The answer is yes?

3 A. Yes, sir.

4 Q. Is there anything in your report
5 that would reflect that?

6 A. No. sir.

7 Q. Did you take her vitals?

8 A. No, sir.

9 Q. Why not?

10 A. I don't recall.

11 Q. Is it protocol that you take the
12 vitals?

13 MS. BEN-SOREK: Objection to
14 form. Ask the witness his policy.

15 Q. Is there a policy or practice
16 with reference to taking vitals?

17 A. We take vitals, but sometimes we
18 are not able to obtain them.

19 Q. Did you take her blood pressure?

20 A. No, sir.

21 Q. Did you make any effort to take
22 her blood pressure?

23 A. I don't recall.

24 Q. Now, in the comment portion you
25 state, "Upon arrival found a sixty-two year

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1 MATTHEW FIELD

2 old female with police stating she told the
3 school psychologist that she wanted to kill
4 herself"; do you see that?

5 A. Yes, sir.

6 Q. Do you remember which of the
7 police officers told you that?

8 A. No, sir.

9 Q. Did you go on and say, "P-T," I
10 assume that's patient?

11 A. Yes, sir.

12 Q. States she said my head hurts so
13 bad I would not care if I die"; do you see
14 that?

15 A. Yes, sir.

16 Q. What is the source of information
17 for that statement?

18 A. The source of information meaning
19 who said it?

20 Q. Yes.

21 A. That would be the patient.

22 Q. Did she say it in your presence?

23 A. Yes, sir.

24 Q. Did she ever say in your presence
25 that she wanted to kill herself?

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1 MATTHEW FIELD

2 A. She, in my presence, stated
3 whatever I wrote on the PCR.

4 Q. But she didn't come out and say
5 it in those many words, "I want to kill
6 myself," right?

7 A. I didn't reflect that on the PCR,
8 right.

9 Q. If she had said that, would it be
10 in the PCR?

11 A. Yes, sir.

12 Q. And she told you she had a
13 headache?

14 A. Yes, sir.

15 Q. And then you say "Is upset as to
16 what is going on with her C-L-S-S," I assume
17 that means class?

18 A. I believe so.

19 Q. And did she tell that you?

20 A. Yes, sir.

21 Q. Did she tell you why she was
22 upset as to what is going on with her class?

23 A. I don't recall.

24 Q. Did she say anything else that's
25 not documented in this comments portion?

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1 MATTHEW FIELD

2 A. If it's not documented, I don't
3 recall, sir.

4 Q. The comment that you say she made
5 about that, "My head hurts so bad I would not
6 care if I die," was that made in the presence
7 of the police officers?

8 A. I'm not sure. I don't recall.

9 Q. Did you ever speak to Ms.
10 McCarthy in the house when the police
11 officers were not present?

12 A. I don't recall.

13 Q. Now, what, if any, training do
14 you remember with reference to mentally
15 disturbed people?

16 MS. BEN-SOREK: Objection to
17 form. You can answer.

18 A. How to speak to people when we
19 know -- when it becomes an issue to restrain
20 somebody.

21 Q. And what do you mean when you
22 speak to people? What do people say or do
23 which would lead you to believe that they're
24 mentally disabled or mental disturbed?

25 A. Make suicidal or homicidal

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1 MATTHEW FIELD

2 comments, acting irrational.

3 Q. When you say acting irrational,
4 what can one do to act irrational?

5 A. Acting aggressive, agitated.

6 Q. Did you observe her acting
7 agitated?

8 A. I don't recall.

9 Q. Did you observe her acting
10 aggressively?

11 A. I don't recall.

12 Q. Now, when you got there was there
13 any discussion between you and the police
14 officers as to whether or not she should be
15 transported to the medical center?

16 A. I don't recall.

17 Q. Did either of the police officers
18 ask you your opinion as to whether or not she
19 should be transported?

20 A. I don't recall, sir.

21 Q. Who is responsible for making the
22 determination as to whether or not she should
23 be transported; was it the police officers on
24 the scene?

25 MS. BEN-SOREK: Objection. You

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1 MATTHEW FIELD

2 can answer.

3 A. Who was responsible?

4 Q. Yes.

5 A. I don't recall in this specific
6 case.

7 Q. Who is normally is responsible?

8 A. The police officer.

9 Q. Now, you said you don't remember
10 this specific case, but who else could have
11 been responsible, other than the police
12 officers?

13 A. No one.

14 Q. So as the AMT is it your call to
15 determine if she goes to the hospital or are
16 you just there to drive the ambulance?

17 A. We go with the police officers to
18 the hospital. We don't drive to the
19 hospital.

20 Q. You don't drive, but do you have
21 any discretion when you arrive? Obviously,
22 the police officers are in control of the
23 scene, right?

24 A. Yes, sir.

25 Q. Do you have any discretion or say

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1 MATTHEW FIELD
2 as an AMT as to whether or not the person
3 gets transported or is it just the police
4 officers' call?

5 MS. BEN-SOREK: Again,
6 objection. You're not asking him
7 procedure. Your asking him his
8 recollection of the --

9 MR. WOLIN: Well, I'm asking him
10 procedure. I don't know that he said
11 that he had a specific recollection.

12 MS. BEN-SOREK: I can't let him
13 testify about procedure for the
14 department. That would be expert.

15 MR. WOLIN: His procedure?

16 MS. BEN-SOREK: His procedure,
17 yes, his recollection of what he
18 does.

19 MR. WOLIN: Right, exactly.

20 A. I don't know the police officers
21 procedures or the law that they, you know,
22 that they --

23 Q. As an AMT are you permitted to
24 overrule a determination of a police officer
25 in transporting somebody to the hospital?

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1 MATTHEW FIELD

2 MS. BEN-SOREK: To your
3 understanding?

4 A. To my understanding? No.

5 Q. So if a police officer says
6 transport that person, you have to transport
7 that person, right?

8 MS. BEN-SOREK: Just for the
9 record, if the AMT feels --

10 A. From my understanding, yes.

11 Q. Based upon your training with
12 mentally disturbed people, did you form any
13 opinion as to whether or not on that day Ms.
14 McCarthy should have been transported?

15 MS. BEN-SOREK: You can answer.

16 A. I don't recall specifics.

17 Q. If I asked you this, I apologize.
18 Did the police officers confer with you about
19 here being transported?

20 MS. BEN-SOREK: Objection, asked
21 and answered. You can answer.

22 A. I don't recall.

23 Q. And then you did and she was
24 transported in the ambulance; is that
25 correct?

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1 MATTHEW FIELD

2 A. Yes, sir.

3 Q. And you arrived at the medical
4 center?

5 A. Yes.

6 Q. And then did you speak to
7 somebody when you arrived?

8 A. We speak to the triage nurse.

9 Q. Do you remember the name of that
10 triage nurse?

11 A. Just based off of my PCR again,
12 it looks like Carson.

13 Q. And what did you say to the nurse
14 and what did the nurse say to you?

15 A. I don't remember specifics.

16 Q. Do you remember generally?

17 A. Typically we tell them what
18 happened, which is reflected in the comments
19 portion of my PCR.

20 Q. How long did you remain in the
21 hospital on this case?

22 A. Physically in the hospital?

23 Q. Yes?

24 A. I don't recall.

25 Q. Is it reflected in your memo

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1 MATTHEW FIELD

2 book?

3 A. Well, this gives the time that we
4 got to the hospital and the time I went back
5 in service.

6 MS. BEN-SOREK: You are pointing
7 to Exhibit 11, the PCR for that?

8 THE WITNESS: Right.

9 A. I don't know if that whole 43
10 minutes I was physically inside the hospital.

11 Q. So you were dispatched at 1412,
12 which is twelve minutes after two, right?

13 A. Yes, sir.

14 Q. And you were at the residence at
15 twenty-one minutes after the hour, correct?

16 A. Yes, sir.

17 Q. And you say you departed scene
18 twenty-seven minutes after the hour, so you
19 were in the residence or at the residence for
20 approximately six minutes?

21 A. Yes, sir.

22 Q. And then you arrived at the
23 medical center at 1447 or 2:47?

24 A. Yes, sir.

25 Q. Then it says clear 1530.

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1 MATTHEW FIELD

2 A. Yes.

3 Q. What does clear mean?

4 A. Back in service.

5 Q. Does that mean you left the
6 hospital?

7 A. Well, sometimes I go -- we have
8 to restock, but it doesn't necessarily mean
9 that I was in the hospital for that time
10 period.

11 Q. Can you tell that by looking at
12 your memo book?

13 A. It's going to reflect the same
14 time, sir.

15 Q. After you arrived and spoke to
16 the triage nurse, did you speak to anyone
17 else at the hospital concerning this matter?

18 A. I don't recall.

19 Q. Again, I may have asked you this,
20 I'm not trying to trick you up. Do you
21 recall what Ms. McCarthy's demeanor was in
22 the ambulance en route to the hospital?

23 A. I don't recall, sir.

24 Q. Now, you state in the patient
25 care report, you use the word depression; do

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1 MATTHEW FIELD

2 you see that?

3 A. Yes, sir?

4 Q. What was your source of
5 information for that.

6 A. Based off of the medications.

7 Q. And who told you about the
8 medications?

9 A. Again, I don't remember specific,
10 but typically it's the patient.

11 Q. Do you remember Ms. McCarthy
12 being cooperative with you in furnishing you
13 this information?

14 A. I don't remember specific, but if
15 she -- if I wrote it here I got it from her
16 and then that would mean that she was
17 compliant.

18 Q. Were you there already when Ms.
19 McCarthy was told that she was going to have
20 to be transported to the hospital?

21 A. I'm not sure what was said prior
22 to my arrival.

23 Q. So you don't remember if it was
24 already known by Ms. McCarthy that she was
25 going to be transported before you got there?

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1 MATTHEW FIELD

2 A. I don't recall, sir.

3 Q. After you got there, do you
4 remember Ms. McCarthy being in an excited
5 state at all?

6 A. I don't recall?

7 Q. Other than this patient care
8 report, do you have any other document that
9 memorializes what happened that day?

10 A. The only other documentation I
11 would have had would be my memo book, sir.

12 Q. Do you ever give a statement to
13 the police department as to what happened?

14 A. Yes, sir.

15 Q. To whom did you give that
16 statement?

17 A. I wrote a letter.

18 Q. To whom did you give it.

19 A. I believe the First Precinct
20 sergeant, sir.

21 Q. Did you give it the same day or
22 sometime thereafter?

23 A. It would have been sometime
24 thereafter. I'm not sure.

25 Q. For what purpose did you give

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1 MATTHEW FIELD

2 this statement?

3 A. He asked me for it, sir.

4 Q. Did he tell you why he was asking
5 for it?

6 A. Yes.

7 Q. What did he say?

8 A. That I was named in a lawsuit,
9 sir.

10 Q. But you gave it to the sergeant;
11 is that correct?

12 A. I believe so.

13 MR. WOLIN: And I call for the
14 production of that. I think there's
15 no privilege there.

16 MS. BEN-SOREK: Take it under
17 advisement and, again, ask for a
18 written.

19 Q. Other than this letter that you
20 gave to the sergeant, this patient care
21 report and the memo book, is there any other
22 written memorialization of what happened on
23 that day?

24 A. To the best of my knowledge, no,
25 sir.

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1 MATTHEW FIELD

2 Q. After May 28th, have you spoken
3 to Officer Amodeo about what happened that
4 day?

5 A. I don't believe so, sir.

6 Q. Have you spoken to Officer Stassi
7 about what happened that day?

8 A. I do not believe so, sir.

9 Q. Have spoken to anyone in the
10 department about what happened that day?

11 A. The sergeant that I wrote the
12 letter to.

13 Q. Other than that?

14 A. No, sir.

15 Q. What was the name of the
16 sergeant?

17 A. I believe it was O'Mara.

18 MR. WOLIN: I have no further
19 questions.

20 MR. SMITH: Good afternoon, sir.
21 my name is Gerald Smith. I am an
22 attorney for the school district and
23 some of its employees who are also
24 defendants in this lawsuit like
25 yourself.

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1 MATTHEW FIELD

2 EXAMINATION BY

3 MR. SMITH:

4 Q. On May 28th, did you speak to any
5 employees of the Roosevelt Union Free School
6 District regarding Ms. McCarthy?

7 A. No, sir.

8 MR. SMITH: I have nothing
9 further.

10 MS. BEN-SOREK: Can I have a
11 couple of questions?

12 MR. WOLIN: Sure.

13 EXAMINATION BY

14 MS. BEN-SOREK:

15 Q. AMT Field, at any time did Ms.
16 McCarthy mention anything about any other
17 physical complaint, other than a headache?

18 A. I don't recall specific, but if
19 she did, it would have been documented on my
20 PCR.

21 Q. Is there anything documented on
22 your PCR about a complaint of chest pain?

23 A. No, sir.

24 MS. BEN-SOREK: Thank you.

25 MR. WOLIN: I have nothing

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1 MATTHEW FIELD
2 further.

3 (Whereupon, at 4:25 p.m.
4 these proceedings were
5 concluded.)

6
7 -----
8 MATTHEW FIELD

9 Subscribed and sworn to
10 before me on this _____ day
11 of _____, 2016.
12 -----

13 NOTARY PUBLIC
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I N D E X

4

WITNESS EXAMINATION BY PAGE LINE

5

MATTHEW FIELD MR. WOLIN 6 4

6

MR. SMITH 34 4

7

MS. BEN-SOREK 34 15

8

REQUESTS PAGE LINE

9

Provide requested documentation 32 13

10

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11

EXHIBIT DESCRIPTION PAGE LINE

12

16 Memo book 7 18

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2

CERTIFICATION

3

4 I, RAYMOND P. STALKER, a notary public in and
5 for the State of New York, do hereby certify:

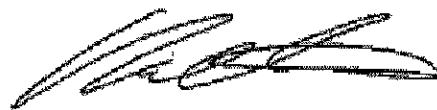
6 THAT the witness whose testimony is hereby
7 before set forth, was duly sworn by me; and
8 that the within transcript is a true record of the
9 testimony given by said witness. I further certify
10 that I am not related, either by blood or marriage,
11 to any of the parties to this action; and

12 THAT I am in no way interested in the outcome
13 of this matter.

14 IN witness whereof, I have hereunto set my
15 hand this 20th day of May, 2016.

16

17



18

RAYMOND P. STALKER

19

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23

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25

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ERRATA SHEET

VERITEXT/NEW YORK REPORTING, LLC

1-800-727-6376

4 330 Old Country Road, 1250 Broadway
 Mineola New York New York, New York

6 Name of Case: McCARTHY v ROOSEVELT, et al

Date of Deposition: 5/12/16

7 Name of DEPONENT: MATTHEW FIELD

8 PAGE LINE CHANGE REASON

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18	-----	-----	-----
19	-----	-----	-----

MATTHEW FIELD

22 SUBSCRIBED AND SWORN TO BEFORE
23 ME THIS DAY OF , 2016.

NOTARY PUBLIC

COMMISSION EXPIRES

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.
THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2014. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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